

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

FEB -1 2017

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRAVION J. BROWN,

Defendant.

4:17CR00051 CEJ/NCC

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about November 20, 2016, in the City of St. Louis, within the Eastern District of Missouri,

TRAVION J. BROWN,

the Defendant herein, acting together with persons known and unknown to the Grand Jury, with intent to cause death and serious bodily harm, did take from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2002 Oldsmobile Bravada, vehicle identification number ("VIN") 1GHDT13S622119197, that had been transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2, and punishable under Title 18, United States Code, Section 2119(1).

COUNT TWO

The Grand Jury further charges that:

On or about November 20, 2016, in the City of St. Louis, within the Eastern District of Missouri,

TRAVION J. BROWN,

the Defendant herein, acting together with persons known and unknown to the Grand Jury, knowingly possessed and brandished a firearm, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, carjacking, in violation of Title 18, United States Code, Section 2119, as set forth in Count One.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE

The Grand Jury further charges that:

On or about November 22, 2016, in the City of St. Louis, within the Eastern District of Missouri,

TRAVION J. BROWN,

the Defendant herein, acting together with persons known and unknown to the Grand Jury, with intent to cause death and serious bodily harm, attempted to take from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2006 Nissan Altima, vehicle identification number ("VIN") 1N4AL11D66C261763, that had been transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2, and punishable under Title 18, United States Code, Section 2119(1).

COUNT FOUR

The Grand Jury further charges that:

On or about November 22, 2016, in the City of St. Louis, within the Eastern District of Missouri,

TRAVION J. BROWN,

the Defendant herein, acting together with persons known and unknown to the Grand Jury, knowingly possessed and brandished a firearm, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted carjacking, in violation of Title 18, United States Code, Section 2119, as set forth in Count Three.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT FIVE

The Grand Jury further charges that:

On or about November 22, 2016, in the City of St. Louis, within the Eastern District of Missouri,

TRAVION J. BROWN,

the Defendant herein, acting together with persons known and unknown to the Grand Jury, with intent to cause death and serious bodily harm, attempted to take from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2002 Mercedes-Benz sports utility vehicle, vehicle identification number ("VIN") 4JGAB54E72A298153, that had been transported in interstate commerce, and in the course thereof, did cause serious bodily injury

In violation of Title 18, United States Code, Sections 2119 and 2, and punishable under Title 18, United States Code, Section 2119(2).

COUNT SIX

The Grand Jury further charges that:

On or about November 22, 2016, in the City of St. Louis, within the Eastern District of Missouri,

TRAVION J. BROWN,

the Defendant herein, acting together with persons known and unknown to the Grand Jury, knowingly possessed, brandished, and discharged a firearm, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted carjacking, in violation of Title 18, United States Code, Section 2119, as set forth in Count Five.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(iii).

A TRUE BILL

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

SAYLER A. FLEMING, #58775MO
Assistant United States Attorney